

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE:) BANKRUPTCY CASE NO.: 19-14114
)
 MARY JO WALLER) CHAPTER 13 PROCEEDING
)
) JUDGE JESSICA E PRICE SMITH
DEBTOR(S))
) DEBTOR'S MOTION FOR AUTHORITY
) TO SELL REAL PROPERTY

Now comes the Debtor, Mary Jo Waller, by and through counsel, and hereby moves this Honorable Court for an Order authorizing her to sell real property as follows.

- 1) Debtor filed a Chapter 13 Bankruptcy petition on July 3, 2019. Debtor's Chapter 13 Plan was confirmed on November 25, 2019.
- 2) Debtor's plan of reorganization provides for 100% distribution to unsecured creditors.
- 3) Debtor is the owner of vacant land located at N. Boone Road in Columbia Station, OH situated in Lorain County (see Schedule A). This property is not encumbered by any mortgage or lien.
- 4) Debtor has received an offer and has entered into a purchase agreement to sell the subject property for the amount of \$120,000.00. (See Purchase Agreement, attached hereto as Exhibit A and incorporated herein). The sale of this property will yield enough proceeds to pay off Debtor's Creditors at a 100% distribution. Debtor currently owes the estate approximately \$80,000.00. Accordingly, this offer is fair and reasonable and is of great benefit to her Creditors.
- 5) The proceeds of the sale shall go directly to the Trustee in order to pay off Debtor's claims with the remaining balance going to the Debtor.

6) It is in the best interests of Debtor and her Creditors that said property be sold pursuant to the terms set forth in the Purchase Agreement. The proposed sale will not prejudice or harm the interests of creditors; instead the proposed sale will greatly benefit all parties.

WHEREFORE, Debtor respectfully requests an Order granting her authority to sell her real property located at N. Boone Road in Columbia Station, Ohio and situated in the County of Lorain.

Respectfully submitted,

J . P . A M O U R G I S & A S S O C I A T E S

/s/ Y. Eric Holtz

Y. Eric Holtz (0084326)
Attorney for Debtors
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Akron, Ohio 44333-3324
Phone: (330) 535-6650
Fax: (330) 535-2205
yeholtz@amourgis.com

CERTIFICATE OF SERVICE

I certify that on May 9, 2020 a true and correct copy of the foregoing was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

- Lauren A Helbling served electronically
- United States Trustee served electronically

And by regular U.S. mail, postage prepaid, on:

All Creditors, Per Attached List

/s/ Y. Eric Holtz

Y. Eric Holtz (0084326)

Label Matrix for local noticing
0647-1
Case 19-14114-jps
Northern District of Ohio
Cleveland
Wed Jul 3 11:59:12 EDT 2019

Howard M. Metzenbaum U.S. Courthouse
United States Bankruptcy Court
Howard M. Metzenbaum U.S. Courthouse
201 Superior Avenue
Cleveland, OH 44114-1235

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Chase Card Services
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850-5298

Citibank
Attn: Recovery/Centralized Bankruptcy
Po Box 790034
St Louis, MO 63179-0034

Cuyahoga County Court of Common Plea
1200 Ontario Street
Cleveland, OH 44113-1610

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Eric S. Peterson, Esq.
1100 Superior Avenue
19th Floor
Cleveland, OH 44114-2521

Huntington
Attn: Bankruptcy CAS056
3 Cascade Plaza
Akron, OH 44308-1124

Huntington National Bank
c/o Officer of the Institution or
Highest Ranking Officer
5555 Cleveland Ave.
Columbus, OH 43231-4048

Huntington Natl Bk
Attn: Officer or Agent
7 Easton Oval
Columbus, OH 43219-6060

Kia Motors Finance
Attn. Officer or Agent
4000 Macarthur Blvd.
Newport Beach, CA 92660-2558

Kia Motors Finance
Attn: Bankruptcy
Po Box 20825
Fountain Valley, CA 92728-0825

Kia Motors Finance
P.O. Box 20835
Fountain Valley, CA 92728-0835

Meaningful Beauty
PO Box 2017
Harlan, IA 51593-0232

(p)PORTFOLIO RECOVERY ASSOCIATES LLC
PO BOX 41067
NORFOLK VA 23541-1067

RBS Citizens Cc
1 Citizens Dr.
Ms: Rop 15b
Riverside, RI 02915-3035

Synchrony Bank/Sams Club
Attn: Bankruptcy Dept
Po Box 965060
Orlando, FL 32896-5060

Lauren A. Helbling
200 Public Square Suite 3860
Cleveland, OH 44114-2322

Mary Jo A. Waller
3329 W. 44th St.
Cleveland, OH 44109-1077

Y. Eric Holtz
Amourgis & Associates
3200 W. Market Street Suite 106
Akron, OH 44333-3324

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Discover Financial
Attn: Bankruptcy Department
Po Box 15316
Wilmington, DE 19850

Portfolio Recovery
Attn: Bankruptcy
120 Corporate Blvd
Norfolk, VA 23502

End of Label Matrix
Mailable recipients 20
Bypassed recipients 0
Total 20